

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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CHINA EXPORT & CREDIT INSURANCE CORP. :

a/s/o Ningbo Shindak Import & Export Co. Ltd., :

CM/ECF

Plaintiff, :

-against- :

Civil Action No.:

2:20-cv-17039-SDW-LDW

INVENTEL LLC, :

Defendant. :

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AFFIDAVIT

Zhenhua Dong, under the penalties of perjury, states as follows:

1. I am a manager at China Export & Credit Insurance Corporation ("CECIC")'s Trade Credit Insurance Claims & Recovery Department. I am fully familiar with the matters set forth below and submit this affidavit in support of Sinasure's motion for default judgment against Defendant Inventel LLC ("Inventel") in the above-captioned matter.

2. In February 2018, CECIC's insured, Ningbo Shindak Import & Export Co. Ltd. ("Ningbo Shindak") submitted a claim for damages in the amount of \$1,011,308.64 in connection with defaulted payments owed by Inventel for goods ordered and delivered. A breakdown of the invoices owed is as follows:

Invoice No.	Amount Outstanding
SD17CH0877	\$279,708.00
SD18CH0087	\$390,303.12
SD18CH0016	\$279,708.00
SD18CH0117	\$61,589.52

3. A true and correct copy of the claim documents, including invoices and shipping details, is attached hereto as **Exhibit A**.

4. CECIC indemnified Ningbo Shindak under this claim as per Ningbo Shindak's insurance policy in the amount of \$759,774.40. A true and correct copy of the Payment Receipt and Subrogation Form, duly stamped by Ningbo Shindak, is attached hereto as **Exhibit B**.

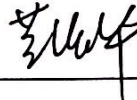


5. CECIC is subrogated to the rights of Ningbo Shindak to the extent of the amount paid and is seeking relief under a breach of contract cause of action in the amount of the subrogated amount of \$759,774.40, plus attorney's fees, costs, and interest.

6. To date, Inventel has failed to plead or otherwise defend this action.

7. The above is true and accurate to the best of my knowledge.

Dated: July 20, 2021



Zhenhua Dong
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